

Answers to Questions Your Firm's Compliance Professional Might Ask

CenturyHouse is a family values transmission platform. Families use it to document their values, their decision-making, their stewardship intent, their traditions, and the preparation of the next generation.

CenturyHouse does not provide any legal, tax, or compliance advice.

***I.* Is our firm engaging CenturyHouse as a service provider?**

No. The family is the contracting party and the data owner. The firm signs nothing beyond a sponsorship order form.

***II.* Does our firm share client nonpublic personal information with CenturyHouse?**

No. Sponsorships are redeemed by invitation code. The family self-registers and enters all information directly. Under amended Regulation S-P, CenturyHouse does not handle or maintain customer information on the firm's behalf.

***III.* Does the firm receive any compensation from CenturyHouse?**

No. Payment flows one direction only. There is no referral fee, revenue share, nor affiliate program payments made from CenturyHouse to firms.

***IV.* Does CenturyHouse provide investment, tax, or legal advice?**

No. CenturyHouse's tools only address non-technical, soft issues of family identity, stewardship intent, narrative, and human development. CenturyHouse never makes investment or securities recommendations and never offers any form of tax or estate structuring advice. That work belongs to the family's advisors and attorneys.

***V.* Do applicable regulations limit firm sponsorship of a client's membership in CenturyHouse?**

Not usually. Firms should apply their own gifts policy. Generally speaking, gift restrictions do not apply to gifts made to individual retail customers. Areas to watch for: 1) where the recipient is an employee of an institutional customer under FINRA Rule 3220, or 2) anything given to a government official, under SEC Rule 206(4)-5, FINRA Rule 2030, and MSRB Rule G-20.

***VI.* Does the platform create communications we must capture?**

No. There is no advisor-to-client messaging inside the platform.

***VII.* What can the advisor see, and how is consent recorded?**

Families own the data and decide who can see the family documents that the family produces. An advisor may only see what the family grants the advisor permission to see. Consent to view is explicit, revocable, and logged, and the log is exportable to the firm's records as needed.

***VIII.* What happens if the relationship ends?**

The family retains its account and its documents. Departure of the advisor changes nothing about the family's access or ownership.

DIRECT CONTACT

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A fifteen-minute call with your compliance team can be arranged at your convenience.